

**Qwest**

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**R. William (Bill) Johnston**

Executive Director  
Federal Regulatory Strategy

**EX PARTE**

July 9, 2002

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Room TW-A325  
445 12<sup>th</sup> Street, S.W.  
Portals II  
Washington, DC 20554

RE: CC Docket No. 96-115, Telecommunications Carriers' Use of Customer  
Proprietary Network Information and Other Customer Information

CC Docket No. 96-149, Implementation of the Non-Accounting Safeguards of  
Sections 271 and 272 of the Communications Act of 1934, as Amended

Dear Ms. Dortch:

On July 8, 2002, Bill Johnston and Kathryn Marie Krause of Qwest met, via a telephone conference call, with William Dever, Marcy Greene and Gina Spade of the Federal Communications Commission's Competition Policy Division of the Wireline Competition Bureau. The purpose of the call was to discuss confirmation issues associated with Customer Proprietary Network Information ("CPNI") approval processes. Qwest representatives described the confirmation process it deployed in January and February of 2002 with respect to customer opt-out decisions. It outlined how confirmations were accomplished through the use of a voice response unit, direct mail and live telephone calls. Commission representatives inquired about possible "confirmations" of customer *approvals* (as opposed to confirmations of opt-out decisions). Qwest advised that such a confirmation regime, while less costly than an opt-in process, would raise legal questions, confuse and quite likely annoy some customers, and substantially increase Qwest's costs without adding any additional benefits to our customers.

Pursuant to FCC Rule 1.49(f), this *ex parte* is being filed electronically via the Electronic Comment Filing System for inclusion in the public record of the above-referenced proceedings.

Respectfully,

/s/ Bill Johnston

cc: William Dever (via email: [wdever@fcc.gov](mailto:wdever@fcc.gov))  
Marcy Greene (via email: [mgreene@fcc.gov](mailto:mgreene@fcc.gov))  
Gina Spade (via email: [gspade@fcc.gov](mailto:gspade@fcc.gov))